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[Additional counsel appear on signature page]

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

BEE, DENNING, INC., d/b/a
PRACTICE PERFORMANCE
GROUP; and GREGORY CHICK,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

CAPITAL ALLIANCE GROUP; and
NARIN CHARANVATTANAKIT,

Defendants.

NO. 3:13-cv-02654-BAS-WVG

**DECLARATION OF BETH E.
TERRELL IN SUPPORT OF
PLAINTIFFS' MOTION FOR
COSTS AND INCENTIVE
AWARDS**

Complaint Filed: 11/5/13

DEMAND FOR JURY TRIAL

Honorable Cynthia Bashant

DATE: November 14, 2016

TIME: 10:30 a.m.

COURTROOM: 4B, 4th Fl. Schwartz

DECLARATION OF BETH E. TERRELL IN SUPPORT OF
PLAINTIFFS' MOTION FOR COSTS AND INCENTIVE AWARDS

1 DANIELA TORMAN, individually
2 and on behalf of all others similarly
3 situated,

4 v.

5 CAPITAL ALLIANCE GROUP d/b/a
6 CAPITAL ALLIANCE d/b/a
7 BANKCAPITAL d/b/a
8 BANKCAPITAL DIRECT d/b/a
9 TRUSTED BANCORP, NARIN
10 CHARANVATTANAKIT a/k/a
11 NARAN CHARAN a/k/a CLAYTON
12 HEATH, and JOHN DOES 1-10,

13 Defendants.

NO. 3:14-cv-02915-JLS-MDD

Honorable Janis L. Sammartino

14 I, Beth E. Terrell, declare as follows:

15 1. I am a member of the law firm of Terrell Marshall Law Group PLLC
16 (“TMLG”), counsel of record for Plaintiffs in this matter. I am admitted to
17 practice before this Court and am a member in good standing of the bars of the
18 states of Washington and California. I respectfully submit this declaration in
19 support of Plaintiffs’ motion for preliminary approval of the settlement of the
20 above-captioned class action.

21 2. Plaintiffs Bee, Denning, Inc., d/b/a Practice Performance Group,
22 Gregory Chick, and Daniela Torman assisted in drafting the complaints and class
23 certification briefing, assisted with providing information regarding their
24 interactions with Defendants, and responded to discovery. Ms. Bee and Mr.
25 Chick also prepared for and sat for depositions, and Mr. Chick and a
26 representative for Bee, Denning, Inc. appeared in Court for an early neutral
27 evaluation. Bee, Denning, Inc., d/b/a Practice Performance Group, Mr. Chick,

28 DECLARATION OF BETH E. TERRELL IN SUPPORT OF
PLAINTIFFS’ MOTION FOR COSTS AND INCENTIVE AWARDS

1 and Ms. Torman will support the settlement regardless of whether the Court
2 awards any incentive payment at all.

3 3. TMLG and Marquis Aurbach Coffing P.C. have incurred \$22,096.00
4 in expenses, which includes filing fees, computerized legal research, investigation
5 expenses, deposition fees, travel, mediation fees, and administrative costs such as
6 copying, mailing, and messenger expenses.

CATEGORY OF EXPENSE	TOTAL
Accurint	\$12.38
Air Fare	\$2,622.28
FedEx	\$235.39
Filing Fees	\$1,000.00
Hotel	\$2,495.02
Meals	\$218.83
Mediation	\$3,775.00
Messenger/Process Server	\$2,217.30
PACER	\$72.50
Parking	\$146.00
Postage	\$15.44
Professional Fees	\$4,929.38
Reproductions & Scanning	\$662.89
Taxi & Rental Car	\$353.47
Transcripts	\$1,287.45
Westlaw	\$2,052.67

28 DECLARATION OF BETH E. TERRELL IN SUPPORT OF
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CATEGORY OF EXPENSE	TOTAL
TOTAL	\$22,096.00

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED at Seattle, Washington, this 30th day of September, 2016.

/s/ Beth E. Terrell, CSB #178181
Beth E. Terrell, CSB #178181

DECLARATION OF BETH E. TERRELL IN SUPPORT OF
PLAINTIFFS' MOTION FOR COSTS AND INCENTIVE AWARDS

CERTIFICATE OF SERVICE

I, Beth E. Terrell, hereby certify that on September 30, 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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DECLARATION OF BETH E. TERRELL IN SUPPORT OF
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Attorneys for Plaintiff Daniela Torman

7 DATED this 30th day of September, 2016.

8 TERRELL MARSHALL LAW GROUP PLLC

9
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Attorneys for Plaintiffs

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